

UNITED STATES DISTRICT COURT - DISTRICT OF NEW HAMPSHIRE

ANDRE BISASOR, Plaintiff,

v.

CRAIG S. DONAIS; RUSSELL F. HILLIARD; DONAIS LAW OFFICES, PLLC;

UPTON & HATFIELD, LLP; and MARY K. DONAIS, Defendants.

Case No.1:23-cv-00374-JL

**EMERGENCY MOTION TO EXTEND TIME OF 7 DAYS TO FILE MOTIONS FOR  
RECONSIDERATION THE COURT'S ORDERS ON 3/13/24**

1. I hereby move the court to allow an extension of time for 7 days until 4/3/24 to file motions for reconsideration of the court's two orders on 3/13/24 (pertaining to Pacer fees and to a stay of deadline to file amended complaint).
2. The motions for reconsideration of these two court orders are due today.
3. I have a number of court deadlines coming up. The court recently issued a dense 18 page report and recommendation that I have to review and digest and respond to. I have two filings regarding sealing matters due next week by 4/1/24. Also, the defendants just filed two hefty objections to the motion to amend complaint, yesterday and the day before, on 3/25/24 and 3/26/24, along with a motion to exceed page limits<sup>1</sup>.
4. With all of the swirl of things going on and to keep track of, I am asking for a brief extension of time.
5. I am only asking for a week's extension on these two filings due today. This extension request is reasonable.
6. I urgently sought **concurrence from the defendants** today but have not received concurrence at this time.
7. I ask that this emergency motion be ruled upon as soon as possible.
8. WHEREFORE, I respectfully request that this Court grants the relief requested or grant any other relief the Court deems proper.

Respectfully submitted,

/s/Andre Bisasor

Plaintiff Andre Bisasor

March 27, 2024

**CERTIFICATE OF SERVICE**

This filing is served to all parties of record via the e-filing system.

/s/Andre Bisasor

Andre Bisasor

---

<sup>1</sup> I will need to prepare motion for extension of time for these as well which I do not have time to do today but I will try to do by tomorrow. I am quickly filing this literally right before I go to a medical appointment.